



UNITED STATES DISTRICT COURT
for the
Eastern District of Virginia

United States of America
v.
SOLOMON MATTHEW HUNT

) Case No. 3:19-mj 129

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 10, 2019 in the county of Henrico in the
Eastern District of Virginia, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. Section 1344	Bank Fraud
18 U.S.C. Section 1028A(a)(1)	Aggravated Identity Theft

This criminal complaint is based on these facts:

See Attached Affidavit

Continued on the attached sheet.

Reviewed by AUSA/SAUSA:

 Michael C. Moore

Sworn to before me and signed in my presence.

Date: 09/26/2019

City and state: Richmond, Virginia


Complainant's signature
Daniel Leary

Printed name and title
Special Agent, Department of Homeland Security


/S/
David J. Novak
United States Magistrate Judge
Judge's signature

David J. Novak, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR CRIMINAL COMPLAINT
AND ARREST WARRANT**

I, Daniel Leary, being duly sworn, depose and say:

INTRODUCTION

1. I am a Special Agent with the United States Department of Homeland Security (DHS), Homeland Security Investigations (HSI). I have been employed by the DHS as a Special Agent since July 2003 and I am currently assigned to the Richmond Office. I have participated in and conducted investigations of identity theft. I have participated in the preparation and presentation of arrest warrants and search warrants, and I am familiar with the methods of individuals who manufacture, use, and possess fraudulent documents and identifications used to defraud banks and other institutions.

2. This affidavit supports an application for a criminal complaint charging SOLOMON MATTHEW HUNT with violations of 18 U.S.C. §§ 1344 (Bank Fraud) and 1028A(a)(1) (Aggravated Identity Theft) and an arrest warrant on that complaint.

3. I have conducted this investigation with assistance from other law enforcement officers including HSI, Virginia Department of Motor Vehicles, United States Secret Service (USSS), Virginia State Police, and several local departments. This affidavit is based upon my personal knowledge, my conversations with other law enforcement agents and sources, and upon my examination of various reports and other records. When the contents of documents or statements of others are reported herein, they are reported in substance and part unless otherwise indicated.

4. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant for SOLOMON MATTHEW HUNT, I have not included each and every fact known to me concerning this investigation. I have set forth

only those facts that I believe are necessary to establish probable cause that SOLOMON MATTHEW HUNT committed the violations of 18 U.S.C. §§ 1344 (Bank Fraud) and 1028A(a)(1) (Aggravated Identity Theft) detailed below.

DETAILS OF THE INVESTIGATION AND PROBABLE CAUSE

5. On April 10, 2019, a reservation was made under the name “Mario Greene” with Enterprise Holdings, which is the parent company of Enterprise Rent-A-Car, National Car Rental and Alamo Rent a Car, to reserve a Ford Expedition or similar SUV at the Richmond International Airport (RIC) location. Later that day, an individual later determined to be HUNT approached the Enterprise rental car counter at RIC and presented a Pennsylvania Driver’s License and a U.S. Bank credit card bearing number XXXX-XXXX-XXXX-7692, the name of “Mario Greene” (who appears to be a fictitious person), and HUNT’s photograph, in order to pay for the rental. A rental car agency attendant suspected the Pennsylvania Driver’s License and U.S. Bank credit card were fraudulent and contacted a RIC Police Officer.

6. RIC police officers encountered HUNT and asked him for identification. An officer observed that the picture on the Pennsylvania Driver’s License was of the individual encountered. HUNT initially provided his brother’s name to the police as his own. HUNT was read his rights, HUNT acknowledged that he understood his rights and HUNT agreed to answer questions. HUNT was transported to a police office for further investigation. HUNT admitted his true identity and provided his actual driver’s license number, date of birth, and social security number.

7. The number on the Pennsylvania Driver's License was found to be fraudulent. The credit card bearing number XXXX-XXXX-XXXX-7692 and the name of "Mario Greene" was also found to be fraudulent.

8. USSS Special Agent (SA) Jerome Andrzejczak arrived at the airport to interview HUNT. SA Andrzejczak read HUNT his rights and HUNT signed a form stating that he understood his rights and agreed to answer questions. HUNT admitted he did not obtain the Driver's License from Pennsylvania and that he paid to have the false identification and credit card made for him by contacts he found on the internet.

9. On May 9, 2019, SA Andrzejczak conducted a follow up interview with HUNT for which HUNT's attorney was present. During the follow up interview, HUNT admitted he used the credit card at a Pizza Hut to see if it would work. HUNT admitted that he did not intend to return the vehicle to the rental agency, but to give it to someone else so that the vehicle could be sold.

10. On September 13, 2019, SA Leary reviewed U.S. Bank credit card statements and documentation for card number XXXX-XXXX-XXXX-7692, which was issued and managed by U.S. Bank for Recreational Equipment Inc. That account did not belong to a "Mario Greene", but to victim R.H. of California. Neither "Mario Greene" nor HUNT is an authorized user on the account. R.H. had contacted the U.S. Bank fraud department about two transactions that occurred in Virginia on April 10, 2019 that R.H. did not engage in or authorize and therefore were fraudulent. One of the transactions was for a purchase at Pizza Hut. U.S. Bank is a financial institution with its deposits insured by the Federal Deposit Insurance Corporation. Card number XXXX-XXXX-XXXX-7692 is a "means of identification" pursuant to 18 U.S.C. §§ 1028(a)(7)(D) and 1029(e)(1).

CONCLUSION

Based on the foregoing, I respectfully request that this Court issue a criminal complaint charging SOLOMON MATTHEW HUNT with violating 18 U.S.C. §§ 1344 (Bank Fraud), and 1028A(a)(1) (Aggravated Identity Theft), as well as a warrant authorizing his arrest on that complaint.



Daniel Leary
Special Agent
Homeland Security Investigations

Sworn to and subscribed before me on September 26th, 2019.



/S/

David J. Novak
United States Magistrate Judge